

Tracy Hope Davis
United States Trustee for Region 2
Office of the United States Trustee
271 Cadman Plaza East, Room 4529
Brooklyn, New York 11201
Telephone: (718) 422-4960
William E. Curtin (WC-1974)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re

Hearing Date: TBD

Hearing Time: TBD

Case No. 11-45867 (JF)

USA UNITED FLEET INC.,
a/k/a SHORELINE FLEET, INC.

Chapter 11

Debtor.

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In re

Case No. 11-45868 (JF)

USA UNITED HOLDINGS INC.,
a/k/a SHORELINE MERGE, INC.

Chapter 11

Debtor.

-----X

In re

Case No. 11-45869 (JF)

UNITED FLEET INC.,

Chapter 11

Debtor.

-----X

In re

Case No. 11-45872 (JF)

UNITED TOM TOM TRANSPORTATION
INC., a/k/a SHORELINE BUSES, INC.

Chapter 11

Debtor.

-----X

In re

Case No. 11-45873 (JF)

USA UNITED BUS EXPRESS INC.,
a/k/a SHORELINE BUS EXPRESS, INC.

Chapter 11

Debtor.

-----X

-----X
In re Case No. 11-45875 (JF)

USA UNITED TRANSIT INC.,
A/k/a SHORELINE PUPIL TRANSIT, INC. Chapter 11

Debtor.

-----X
In re Case No. 11-45876 (JF)

TOM TOM ESCORTS ONLY, INC., Chapter 11

Debtor.

-----X
In re Case No. 11-45877 (JF)

SHORELINE TRANSIT INC., Chapter 11

Debtor.

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PLEASE TAKE NOTICE that upon the within motion and concurrently filed memorandum of law and declaration, Tracy Hope Davis, the United States Trustee for the Eastern District of New York (the "United States Trustee") will move before the Honorable Jerome Feller, United States Bankruptcy Judge, in the United States Bankruptcy Court, 271 Cadman Plaza East, Brooklyn, New York, **at a date and time to be determined**, or as soon thereafter as counsel can be heard, for entry of an order directing conversion of this case to chapter 7 and for such other and further relief as this Court may deem just and proper.

WHEREFORE, the United States Trustee respectfully requests that this Court enter an order converting these cases to chapter 7 or grant such other relief as the Court deems just, fair, and equitable.

Dated: Brooklyn, New York
July 20, 2011

TRACY HOPE DAVIS
UNITED STATES TRUSTEE
FOR REGION 2

By: /s/ William E. Curtin
William E. Curtin (WC-1974)
Trial Attorney
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